

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

BKY 23-30259  
Chapter 13

Joseph Bourne and Kasey Bourne,  
Debtors.

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**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

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Kyle L. Carlson, Chapter 13 Trustee, objects to confirmation of the Chapter 13 plan filed by the debtors and requests that confirmation hearing be continued.

1. The Trustee has yet to conduct the 341 meeting of creditors. Until that meeting is held, the Court, Trustee, and creditors cannot determine whether any plan filed satisfies the requirements of 11 U.S.C. §§ 1322 & 1325.

2. Following the completion of the meeting of creditors, the Trustee will file a supplemental objection identifying specific concerns or will withdraw this objection.

WHEREFORE, the Trustee requests that confirmation hearing be continued.

Dated: 9-6-23

/s/ Kyle L. Carlson  
Kyle L. Carlson  
Chapter 12 & 13 Trustee  
PO Box 519  
Barnesville, MN 56514  
218-354-7356

**VERIFICATION**

I, Kyle L. Carlson, Chapter 13 Trustee, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 9-6-23

/s/ Kyle L. Carlson  
Kyle L. Carlson, Trustee

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Debtor.

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**UNSWORN DECLARATION FOR PROOF OF SERVICE**

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The undersigned, being an employee of the standing Chapter 13 Trustee, declares that on the date indicated below, I served the attached Trustee's Objection to Confirmation of Chapter 13 Plan upon all entities named below by first class mail postage prepaid and to any entities who are Filing Users, by automatic e-mail notification pursuant to the Electronic Case Filing System:

Joseph Bourne and Kasey Bourne  
12249 26F Street NW  
Watford City, ND 58854

And I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: 9-6-23

/s/ Patricia Halverson  
Patricia Halverson  
Chapter 13 Office